

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN THE MATTER OF:	)	Chapter 7
	)	
INVERNESS TILE, LTD.,	)	No. 04 B 02925
	)	
Debtor.	)	Judge John H. Squires

**FIRST AND FINAL APPLICATION OF TRUSTEE'S COUNSEL  
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

TO: THE HONORABLE JOHN H. SQUIRES,  
BANKRUPTCY JUDGE

Cohen & Krol, Attorneys for the Trustee herein, for its application for compensation and reimbursement of expenses, respectfully represents unto this Honorable Court as follows:

1. On January 26, 2004, Inverness Tile, Ltd., Debtor herein, filed its voluntary petition for relief pursuant to Chapter 7 of the Bankruptcy Code. Gina B. Krol is the duly appointed Chapter 7 Trustee for the Debtor's bankruptcy estate.
2. On or about February 3, 2004, this Honorable Court entered an order authorizing Cohen & Krol to act as Attorneys for the Trustee in the above-referenced bankruptcy proceeding.
3. Since its employment, Cohen & Krol has rendered legal services to the Trustee and the Estate and incurred expenses as outlined in the following paragraphs and further detailed in the attached billing. Cohen & Krol is requesting final compensation and reimbursement of expenses in the total amount of \$11,954.47.

**4. ADVERSARY COMPLAINTS**

Cohen & Krol represented the interests of the Trustee and the Estate during the course of six adversary complaints. Complaints were filed against Heartland Tile & Marble, Inc., Lanco Development Company, Sears Roebuck and Company, Pulte Home Corporation and Lakeland Homes Inc. to recover accounts receivable. Cohen & Krol also filed a complaint against Julie and David Murkowski for funds removed from the Debtor's bank accounts. Cohen & Krol investigated the nature, potential and validity of the Trustee's actions against each of the defendants. Cohen & Krol also reviewed answers, motions, pretrial statements, and settlement offers and appeared in Court on numerous occasions. These actions recouped funds for the Estate for distribution to creditors. Cohen & Krol expended 25.36 hours, comprising \$7,496.90 in legal time, in the category of Adversary Complaints.

**5. ASSET RECOVERY**

Similar to the work conducted in the category of Adversary Complaints, in Asset Recovery, Cohen & Krol sought to recover and liquidate all Estate assets. The actions undertaken in Asset Recovery include obtaining the Court's approval for the auction of the Debtor's property and demanding the turnover of various accounts receivable due the Debtor. These actions were also critical for bringing funds into the Bankruptcy Estate. Cohen & Krol expended 4.35 hours, totaling \$782.75, in the category of Asset Recovery.

**6. OBJECTIONS TO CLAIMS**

Cohen & Krol represented the interests of the Trustee and the Estate in discussions with the Debtor's counsel regarding claims filed and in successfully

objecting to the claim of Stone Design. Cohen & Krol expended 1.33 hours or \$417.50 in the category of Objections to Claims.

**7. PROFESSIONAL EMPLOYMENT**

Cohen & Krol prepared and presented motions to employ counsel, an auctioneer and an accountant for the Estate. Cohen & Krol prepared the instant fee application, the fee applications of Alan Lasko, the accountant for the Estate, and a motion for the reimbursement of the auctioneer. These motions were necessary to further the administration of this case. Cohen & Krol spent 6.98 hours, comprising \$2,255.95, in the activity of Professional Employment.

**8. TAX RETURNS**

Cohen & Krol corresponded with the accountant for the Estate regarding various issues with the Debtor's prior taxes, overpayment issues and communications with the Debtor's prior accountant. All of these issues were relevant to the preparation of the Estate's taxes. Cohen & Krol spent 1.10 hours, or \$381.00, in the category of Tax Returns.

**9. OTHER CATEGORIES**

Cohen & Krol also provided legal counsel to the Trustee in the categories of: Automatic Stay, for 0.40 hours, totaling \$140.00, comprising time corresponding with the Internal Revenue Service; Claims, for 0.20 hours or \$63.00, consisting of time reviewing correspondence and a claim from a creditor and; General Administration for 0.25 hours or \$78.75, for counsel present at the Debtor's motion to extend time to file its schedules.

10. **EXPENSES**

Cohen & Krol seeks the reimbursement of expenses totaling \$338.62 in relation to this case, as indicated below. Additionally, attached hereto is a detailed listing of the out-of-pocket expenses incurred to date in this regard.

Photocopies	\$127.20
Postage	\$211.42

11. **SUMMARY**

The hourly rates of the attorneys of Cohen & Krol are as follows:

GINA B. KROL - GBK2004	\$315.00
GINA B. KROL - GBK2005	\$330.00
GINA B. KROL - GBK2006	\$350.00
GINA B. KROL - GBK2007	\$365.00
LINDA M. KUJACA - LMK2004	\$255.00
LINDA M. KUJACA - LMK2006	\$290.00
LINDA M. KUJACA - LMK2007	\$300.00

The hourly rates of the paralegals and secretaries of Cohen & Krol are as follows:

MARGARET BURAU - MAB2004	\$80.00
MARGARET BURAU - MAB2005	\$80.00

The fair market value of the services rendered by Cohen & Krol as attorneys for the Trustee in these proceedings, based upon the skill required, the nature of the services rendered and the usual and customary fees charged by Cohen & Krol for services of this type, is \$11,615.85. Cohen & Krol has not received any compensation whatsoever in connection herewith. Cohen & Krol is seeking reimbursement of expenses of \$338.62.

WHEREFORE, Cohen & Krol, Attorneys for the Trustee herein, prays that it be awarded compensation in the amount of \$11,615.85 and reimbursement of expenses in

the amount of \$338.62, and for such other and further relief as this Court shall deem proper.

Gina B. Krol  
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Linda M. Kujaca  
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Respectfully Submitted,  
Cohen & Krol,

BY: /s/ Gina B. Krol  
One of its attorneys